



Plug In America  
309A Steiner Street  
San Francisco, CA 94117  
[www.PlugInAmerica.org](http://www.PlugInAmerica.org)  
[info@pluginamerica.org](mailto:info@pluginamerica.org)

July 1, 2009

Mr. Matthew Crosby  
Policy and Planning Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

Re: Comments on CPUC Whitepaper: Light-Duty Vehicle Electrification in California:  
Potential Barriers and Opportunities

Dear Mr. Crosby,

We applaud your work and the California Public Utilities Commission (CPUC) for its commitment in developing the whitepaper: *Light-Duty Vehicle Electrification in California: Potential Barriers and Opportunities*. Thank you for the opportunity to comment on this document. The work that you have done provides an excellent overview of both the opportunities and challenges as we move toward electricity as a primary transportation fuel.

We agree with many of the other participants that the CPUC needs to establish a permanent regulatory track devoted to the issues around vehicle electrification. From infrastructure issues to utility regulation and capacity, there are opportunities and market barriers which the CPUC is uniquely positioned to address. Plug In America would be very interested in further participating in this process along with other stakeholders so that we can help address the needs of consumers as they begin to acquire these next generation plug-in vehicles and as the market grows.

We also support the assertion in the whitepaper that the CPUC should actively engage in the policy decisions which will encourage rate structures to facilitate off-peak charging and the integration of additional renewables (especially solar and wind) into the grid to support on-peak boosted PEV charging as PEV charging infrastructure is deployed. Significant opportunities exist to collocate electricity generation with PEV charging (eg. PV/EV parking structures).

The CPUC will need to streamline the regulatory process so that the utilities or other third parties can provide a simplified consumer startup process for PEVs. Since consumers will be shifting their fueling from primarily "service stations" to their homes, any regulatory action you can take which makes it easier for a consumer to "install" home PEV charging would help reduce this key obstacle. A review of municipal codes which restrict PEV charging in homes, businesses, or apartments would be very appropriate.

One of the most important charging infrastructure issues is making sure that any consumer who purchases a PEV can charge at any location where there is publicly available charging. Various organizations dealt with this issue during the late 1990s with limited success. Plug In America has been working with several of the PEV charging infrastructure providers to ensure every vehicle can charge in every space. We are also making significant progress toward a single unified charge connector standard (J1772) which will help to make this happen. The CPUC can play an important role in rulemaking which supports this key market success factor.

In addition, with regard to public charging, we believe it is necessary to create a universal payment system that allows customers to use a single payment method, such as an RFID tag, to pay for all public charging. This will ensure that fueling PEVs is as easy as fueling a conventional gasoline vehicle, no matter what entity installs and maintains the meter.

With respect to all PEV charging infrastructure, it is very important to remember that one of the key advantages to electricity is that while the upfront cost for the PEV could be higher, the fuel is significantly less expensive. Plug In America wants to make sure that consumers can see this pricing advantage and that it doesn't get lost in aggregation.

Thank you for your work in making California a leader in making an ever cleaner electricity grid reducing greenhouse gas emissions and air pollution, and for your consideration of these comments and recommendations. We look forward to working with you and the CPUC in the future.

Sincerely,

A handwritten signature in black ink, appearing to read "Jay Friedland". The signature is fluid and cursive, with the first name "Jay" being more prominent.

Jay Friedland  
Legislative Director, Plug In America